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May 11, 1994

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## DELIVERY BY HAND

Mr. Richard Metzger  
Acting Chief  
Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W.  
Room 500  
Washington, D.C. 20554

Re: CC Docket No. 92-166

Dear Mr. Metzger:

Motorola Satellite Communications, Inc. ("Motorola"), hereby submits this letter in opposition to the request of TRW, Inc. for an extension of time to submit reply comments in the above-referenced proceeding.

Applications for authority to construct low-Earth orbit ("LEO") mobile satellite systems have been pending for well over three years. Motorola filed its application for the IRIDIUM system in December 1990. Since that time, Motorola has been an active participant in all of the proceedings relating to the allocation of MSS spectrum and the licensing of global mobile satellite systems, including the negotiated rulemaking proceeding and the Commission's Notice of Proposed Rulemaking, 9 FCC Rcd. 1094 (1994). Indeed, Motorola filed extensive comments on May 5, 1994, in response to the proposals contained in the Notice.

Motorola can appreciate that much work will have to be done between now and the time that reply comments are due in this proceeding; however, the Commission should not countenance any further delays in the already lengthy regulatory process. Motorola is prepared to devote the necessary resources to review all of the comments filed on May 5th, and respectfully submits that any other applicant serious about moving forward the licensing process should do so as well. None of the positions of any of the other parties should have come as a surprise to anyone.

Moreover, while Motorola is certainly willing to work hard over the next weeks and months toward reaching a settlement

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with the other parties in this proceeding, it believes that such discussions would be furthered by having a complete record of all comments and reply comments filed at the Commission at the earliest possible time.

Thank you for your prompt consideration of this matter.

Respectfully submitted,



Philip L. Mares

Counsel for Motorola Satellite  
Communications, Inc.

cc: Attached Service List

CERTIFICATE OF SERVICE

I, Philip L. Malet, hereby certify that the foregoing letter was served by first-class mail, postage prepaid, this 11th day of May 1994, on the following persons:

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